



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
901 NORTH 5TH STREET  
KANSAS CITY, KANSAS 66101

OCT 12 1999

Ward E. Herst  
Herst & Associates, Inc.  
5988 Mid Rivers Mall Drive, Suite 213  
St. Charles, Missouri

Dear Mr. Herst:

Re: Westlake Landfill OU 2

40331959



Superfund

We have reviewed the preliminary site characterization documents for the Westlake Landfill Operable Unit 2. Comments on the Site Characterization Summary Report prepared by Water Management Consultants, Inc. are described below. Many of these comments are intended to aid in the development of a remedial investigation report, and it is not our expectation that a revised version of the Site Characterization Summary Report be submitted. In general, we found the data base to be sufficient to allow for advancement of the RI/FS process and believe that this site may be a good candidate for streamlining through use of EPA's presumptive remedy strategy for municipal landfill sites. Presumptive remedy guidance documents are available on the internet at:  
<http://www.epa.gov/oerrpage/superfund/resources/presump/index.htm>.

General Comments

1. The OU 2 remedial investigation relies on information provided in several reports including the Site Characterization Summary Report, the Physical Characterization Technical Memorandum, and the draft OU 1 Remedial Investigation Report. In order to develop a "stand alone" remedial investigation report, all of this information should be integrated and more thoroughly described than what is currently provided in the Site Characterization Summary Report. A certain amount of referencing may be appropriate and necessary but should be more detailed, i.e., include section, page numbers, table number, etc.
2. We suggest greater use of maps or figures to present key information such as the proposed groundwater monitoring network, the nature and extent of contamination, and location of the groundwater divide.
3. The report provides no description of the process undertaken pursuant to the permit for the active solid waste landfill. Any data reports or closure plans that have been planned or developed should be referenced and described. Any remedy pursued under CERCLA will need to be compatible with such plans.

## Chapter 2 - Background and Site Description

- Some information on how and why the site was divided into two operable units, what is encompassed under each, and how the remedy selection process will be coordinated to ensure compatibility would be helpful.

## Chapter 4 - Groundwater Quality

- Section 4.1 – Define the proposed monitoring well network including well name, location, depth, elevation, and hydrogeologic zone monitored.
- Section 4.1 – Include a table of groundwater piezometric levels from the 49 piezometers and 24 other existing wells, and representative piezometric surface maps to aid in evaluation of groundwater flow.
- Table 4.2 - Provide reference to analytical methods and detection limits.
- Section 4.4.2 – Were VOCs, SVOCs, pesticides, or PCBs detected in any of the other background wells (S-80, I-50, or PZ-300-AS)?
- Section 4.5.1 – In what piezometer was the pesticide Gamma-chlordane detected?
- Section 4.5.3 – Include SVOC constituents and concentration detected in PZ-303-AS.
- Table 4.11 and 4.13 – Is “reporting limit” the same as detection limit and where can we find these?
- Section 4.2 – A table detailing which hydrogeologic zone each well within each of the clusters is monitoring would be helpful.

## Chapter 5 - Surface Water and Sediment Quality

- Section 5.1 – Should that be TPH instead of TOC results in the last sentence of the first paragraph?
- Section 5.2.2 – The text should include the concentrations of acetone and methyl ethyl ketone detected in the upstream sediment sample.

## Chapter 6 – Leachate Sampling and Analysis

- A table including the results of the inorganic compounds and radionuclide sampling would be helpful.

### Chapter 8 - Landfill Gas Characterization

- A table listing the concentration of volatile organics detected in the PZ-1201-SS landfill gas sample would be helpful.

### Chapter 9 - Alluvial Soil Organic Analysis

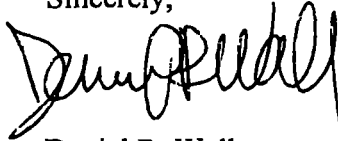
- Should the title of Table 9.2 say PZ-303-AS?

### Chapter 10 - Quality Assurance Samples and Data Validation

- Sampling methods could be better presented in tabular form.

If you have any questions on these comments please call me at (913) 551-7710. We look forward to meeting with you on October 26, 1999 to discuss a path forward for the Westlake Landfill site.

Sincerely,

A handwritten signature in black ink, appearing to read 'Daniel R. Wall', written in a cursive style.

Daniel R. Wall  
Remedial Project Manager

cc: Jalal El-Jayyousi, MDNR  
Paul Rosasco, EMI, Inc.